

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

WILLIAM EDWARDS

*Defendant(s)*

Case No.

13-1420-M

FILED

DEC 17 2013

MICHAEL E. KUNZ, Clerk  
U.S. District Court

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of see attached affidavit in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

*Code Section*

*Offense Description*

18 U.S.C. 2113(a), Bank Robbery -  
3 Counts. See Attachment A.

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.



*Complainant's signature*

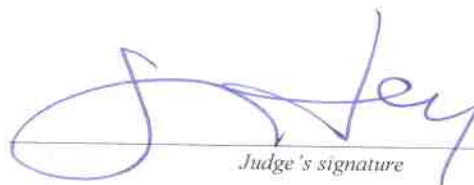
JOHN SERMONS, Federal Bureau of Investigation

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 12/17/13

City and state: Philadelphia, PA



*Judge's signature*

ELIZABETH T. HEY, U.S. Magistrate Judge

*Printed name and title*

**ATTACHMENT A**

**18 U.S.C. § 2113(a)**  
**Bank Robbery**

**Count One**

On or about December 2, 2013, in the city and county of Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM EDWARDS did, by force and violence, or by intimidation, take from the person or presence of another, U.S. currency belonging to PNC Bank, 1801 Market Street, Philadelphia, Pennsylvania, the deposits of which were federally insured.

**Count Two**

On or about December 9, 2013, in the city and county of Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM EDWARDS did, by force and violence, or by intimidation, take from the person or presence of another, U.S. currency belonging to Citizens Bank, 7327 Frankford Avenue, Philadelphia, Pennsylvania, the deposits of which were federally insured.

**Count Three**

On or about December 13, 2013, in the city and county of Philadelphia, in the Eastern District of Pennsylvania, defendant WILLIAM EDWARDS did, by force and violence, or by intimidation, take from the person or presence of another, U.S. currency belonging to Susquehanna Bank, 1845 Walnut Street, Philadelphia, Pennsylvania, the deposits of which were federally insured.

**AFFIDAVIT IN SUPPORT OF ARREST WARRANT**

I, JOHN DEVEN SERMONS, being duly sworn, do hereby depose and state that:

A. I am employed as a Special Agent of the Federal Bureau of Investigation ("FBI") in Philadelphia, Pennsylvania. I have been employed as a Special Agent since January 2010. I am presently assigned to the Violent Crimes Task Force, which investigates bank robberies, kidnapping, fugitives, and Hobbs Act robberies, among other violations of federal law.

B. The following information was compiled by your affiant from a variety of sources to include my personal knowledge, information obtained during my participation in this investigation, review of documents, knowledge obtained from other individuals including law enforcement personnel, and communications with others who have personal knowledge of the events and circumstances described herein. This affidavit is being submitted in support of an arrest warrant for WILLIAM EDWARDS for his participation in the following bank robberies: The December 2, 2013 robbery of PNC Bank, 1801 Market Street, Philadelphia, Pennsylvania, the December 9, 2013 robbery of Citizens Bank, 7327 Frankford Avenue, Philadelphia, Pennsylvania, and the December 13, 2013 robbery of Susquehanna Bank, 1845 Walnut Street, Philadelphia, Pennsylvania. I have not included every fact known to me concerning this investigation, rather I have submitted only those facts and circumstances that I believe establish probable cause to support the issuance of an arrest warrant for EDWARDS.

**THE DECEMBER 2, 2013 PNC BANK ROBBERY**

At approximately 3:20 PM. on December 2, 2013, a white male, later identified as WILLIAM EDWARDS, entered the PNC Bank located at 1801 Market Street, Philadelphia, Pennsylvania. EDWARDS was described as being a white male, having an approximate height of 6', having a thin build, having an approximate age of 30 years old, wearing a black "Phillies"

baseball hat with a white "P" on the front, and a gray hooded sweatshirt with a black sweatshirt underneath. EDWARDS approached the victim teller and handed her a note that read "Put the money in the bag." EDWARDS then stated to the victim teller "You know what the fucking note says, put the fucking money in the bag." The victim teller complied with EDWARDS' demands and handed him US currency from the teller drawer as well as a GPS tracking device.

EDWARDS then fled the bank. A bank audit revealed that EDWARDS acquired \$1,353.00 from the robbery.

Customer A.A., who was present during the robbery, advised police that while waiting to see a bank teller, Customer A.A noticed EDWARDS standing at the teller counter. EDWARDS appeared to be angry and was reaching over the teller counter toward a female teller in an assertive manner. The female teller appeared to be afraid and handed something to EDWARDS.

Moments later, EDWARDS fled the bank in an unknown direction.

The bank surveillance photographs acquired from PNC Bank security were disseminated to surrounding police departments as well as the news media. In response, numerous tips identified WILLIAM EDWARDS, date of birth, 9/9/1981, as the individual responsible for the December 2, 2013 robbery of PNC Bank, 1801 Market Street, Philadelphia, Pennsylvania.

On December 5, 2013, the victim teller positively identified WILLIAM EDWARDS from a photo array as the person who committed the robbery on December 2, 2013. The same day Customer A.A. also positively identified WILLIAM EDWARDS from the photo array as the person who committed the robbery.

#### **THE DECEMBER 9, 2013 CITIZENS BANK ROBBERY**

At approximately 2:30 P.M. on December 9, 2013, a white male, later identified as WILLIAM EDWARDS, entered Citizens Bank located at 7237 Frankford Avenue, Philadelphia,



Pennsylvania. The victim teller described EDWARDS as being a white male in his 30's, medium build, height between approximately 5'8" and 5'9", and wearing a dark knit cap with white writing on the front and a light colored coat.

EDWARDS approached the victim teller and provided a note that read "Give me all the money and no one will get hurt. Have a gun!" After handing the victim teller the demand note, EDWARDS leaned over the teller counter and looked in the victim teller's drawer. The victim teller removed loose currency from the teller drawer and gave the money to EDWARDS. After receiving the money from the victim teller, EDWARDS pointed to a stack of currency in the teller drawer and demanded it. The stack of currency contained a dye pack. After receiving the dye pack, EDWARDS looked in the direction of another bank teller (herein referred to as V.M.) and stated "Don't you dare do that." EDWARDS then fled the bank in an unknown direction.

Teller V.M. advised members of the Philadelphia Police Department (PPD) that while working at her teller station, she could tell that the first victim teller was frightened. While EDWARDS was standing at the first victim teller's window, EDWARDS turned to V.M. and said, "I can see what you are doing, don't do anything, I have a gun." V.M. observed the victim teller hand EDWARDS an unknown amount of US currency. After receiving the money, EDWARDS ran out of the bank headed South on Frankford Avenue.

A bank audit revealed that EDWARDS stole \$943.00 from the robbery.

On the evening of December 9, 2013, the writer and PPD Detective Mark McCullion attempted to locate EDWARDS at 3010 Hellerman Avenue, Philadelphia, Pennsylvania, an address EDWARDS was reported to frequent. After arriving at the above stated address, the writer and McCullion were greeted by CHRISTOPHER BRAND. BRAND advised the writer and McCullion that he was dating EDWARDS's sister ROXANNE EDWARDS. BRAND stated that

he had not seen EDWARDS in many weeks and was not sure where EDWARDS was living. Utilizing his cellular telephone, McCullion showed BRAND a surveillance photograph depicting the individual responsible for the December 9, 2013 robbery of Citizens Bank located at 7237 Frankford Avenue, Philadelphia, Pennsylvania. BRAND examined the photograph and stated that the individual in the photograph was WILLIAM EDWARDS.

**THE DECEMBER 13, 2013 SUSQUEHANNA BANK ROBBERY**

At approximately 11:00 A.M. on December 13, 2013, a white male, later identified as WILLIAM EDWARDS, entered Susquehanna Bank located at 1845 Walnut Street, Philadelphia, Pennsylvania, picked up a handful of deposit slips, and exited the bank. The victim teller described EDWARDS as a white male, having an approximate height of 5'5", having light colored hair, and a thin build.

Just two hours later, at approximately 1:00 P.M., EDWARDS reentered the above stated bank, approached the victim teller and passed a demand note. The victim teller advised PPD that she was only able to read the word "please" on the demand note. EDWARDS stated to the victim teller "stay calm, act normal. Give me the money. I want everything in large." The victim teller complied with EDWARDS' demands and handed him U.S. currency in denominations of 100 and 50 bills from the teller drawer. EDWARDS again demanded all the "large". The victim teller advised him that the money she handed him was all she had. EDWARDS then demanded, "OK, give me the twenties, tens and fives. I don't want no dye packs, no bait. I don't want to have to come back". The victim teller again complied with EDWARDS' demands and handed him additional U.S. currency from her teller drawer. After receiving money EDWARDS exited the bank and fled West on Walnut Street.

A bank audit revealed that EDWARDS stole \$2,000.00 during this robbery.

On December 13, 2013, a photo array containing eight photographs, one photo being that of EDWARDS, was shown separately to the victim teller and one witness to the December 13, 2013 robbery of Susquehanna Bank, 1845 Walnut Street, Philadelphia, Pennsylvania. After reviewing the photo array, the victim teller and the witness positively identified EDWARDS as being the individual responsible for the above stated robbery.

The deposits of PNC Bank, Citizens Bank, and Susquehanna Bank are all federally insured by the Federal Deposit Insurance Corporation (FDIC), and were so insured at the time of each of the robberies.

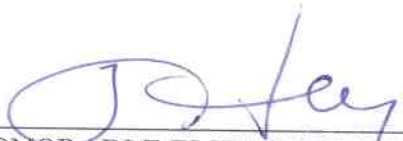
Based on all of the facts set forth in this affidavit and based on my training and experience, I have probable cause to believe that WILLIAM EDWARDS conspired to rob and did rob the following banking institutions on the following dates: The December 2, 2013 robbery of PNC Bank, 1801 Market Street, Philadelphia, Pennsylvania, the December 9, 2013 robbery of Citizens Bank, 7327 Frankford Avenue, Philadelphia, Pennsylvania, and the December 13, 2013 robbery of Susquehanna Bank, 1845 Walnut Street, Philadelphia, Pennsylvania, all in violation of Title 18, United States Code, Section 2113(a).



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JOHN DEVEN SERMONS  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn before me  
this day 17<sup>th</sup> of December, 2013.



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HONORABLE ELIZABETH T. HEY  
*United States Magistrate Judge*